



State of Idaho

Department of Administration
Office of the Chief Information Officer

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February 16, 2012

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: INTERNATIONAL BUREAU ESTABLISHES PLEADING CYCLE FOR LIGHTSQUARED PETITION FOR DECLARATORY RULING, IB Docket No. 11-109, ET Docket No. 10-142

Dear Mr. Chairman:

On December 20, 2011, LightSquared Inc. (LightSquared) filed a Petition for Declaratory Ruling, requesting the FCC "resolve the regulatory status of unlicensed commercial Global Positioning System (GPS) receivers." In essence, LightSquared asks for a ruling that users of unlicensed commercial GPS devices have no legal standing to seek protection against harmful interference from other systems, including terrestrial broadband services from LightSquared through their licensed operations in the Mobile-Satellite Service (MSS) band.

We recognize the importance of broadband technology and the many benefits it brings to our society, and we are especially anxious to expand opportunities for broadband services that can serve our substantial rural population. However, we also recognize the importance of global navigation satellite systems and GPS, which are used daily across Idaho in such critical applications as precision agriculture, highway transportation and road construction, emergency management, surveying, scientific research, and recreation.

Numerous independent reports raise concerns about GPS interference from the LightSquared system; including the National Telecommunications and Information Administration (NTIA), the Federal Aviation Administration, and the Department of Defense. As their reports indicate little hope of a practical solution to interference, we are concerned that the critical applications mentioned above may be adversely impacted by the declaratory ruling requested by LightSquared. We are also concerned with the possible economic impact of retro-fitting or replacing GPS receivers that may be necessary as a result of interference to GPS systems.

The Idaho Geospatial Council Executive Committee supports adoption of the NTIA recommendations to resolve this issue, specifically "to explore appropriate actions to mitigate against the impact GPS and other receivers may have to prevent the full utilization of spectrum to meet the nation's broadband needs." For more information please contact the Committee Chair, Liza Fox, at (208) 395 6038 or Liza.Fox@supervalu.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Zickau".

Greg Zickau

Chief Technology Officer, State of Idaho